

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE

CARMINEE MARQUEZ ARROYO

DEBTOR

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CASE NO. 18-00821 ESL

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2018 TAX REFUND**

TO THE HONORABLE COURT:

NOW COMES, **CARMINEE MARQUEZ ARROYO**, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor's proposed Amended Chapter 13 Plan dated 08/09/2018 provides that Debtor's tax refunds will be paid into the Plan. See: Docket No. 32, in the above captioned case.
2. The Debtor received the 2018 tax refund in the sum of \$471.00.
3. The Debtor respectfully submits to this Honorable Court that she needs to use these funds to pay for: purchase a set of tires for her motor vehicle.
4. Attached to this motion is copy of an invoice for this expense.
5. The Debtor needs to use these funds from the 2018 "tax refund" to pay for this reasonable expense. The Debtor is living within a very "tight" budget which barely covers his daily expenses and a Plan payment of \$549.00.
6. Based on the abovestated, the Debtor respectfully requests this Honorable Court to Order the authorization of the use of these funds to allow the Debtor to pay for the above stated expense, with the 2018 tax refund.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the Debtor's 2018 tax refund.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent to the Debtor via US Mail to Carminee Marquez Arroyo, PO Box 5451 Caguas PR 00726.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 08th day of July, 2018.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

ATTORNEY FOR the DEBTOR

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CARMINEE MARQUEZ ARROYO
PO BOX 5451
CAGUAS PR 00726-5451

Para abrir este lado - deslize el dedo por debajo de este borde

H27146356

FECHA	NUMERO DE COMPROBANTE	DESCRIPCION/CONTRATO	FACTURA/OPE	IMPORTE DEL COMPROBANTE
29/05/19	000052	REINT 2018	----	\$*****471.00

	DIA	MES	AÑO
19903386	29	05	19
NUMERO DE CHEQUE	FECHA EMISION		

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RETENGA ESTE TALON
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